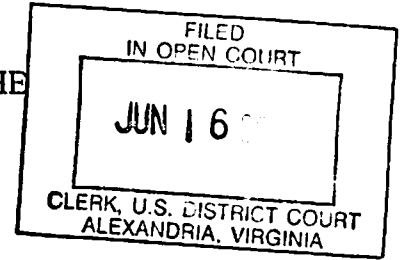


IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA	)	CRIMINAL NO. 1:11CR283-GBL
	)	
	)	Count 1: 18 U.S.C. § 2251(a)
v.	)	Production of Visual Depictions of Minors
	)	Engaging in Sexually Explicit Conduct
	)	
	)	Count 2: 18 U.S.C. § 2251(a)
JUSTIN M. COLEMAN,	)	Production of Visual Depictions of Minors
	)	Engaging in Sexually Explicit Conduct
	)	
Defendant.	)	Count 3: 18 U.S.C. §§2251(a) &(e)
	)	Attempted Production of Visual Depictions
	)	of Minors Engaging in Sexually Explicit
	)	Conduct
	)	
	)	Count 4: 18 U.S.C. §§2251(a) &(e)&3238
	)	Attempted Production of Visual Depictions
	)	of Minors Engaging in Sexually Explicit
	)	Conduct
	)	
	)	Count 5: 18 U.S.C. §§ 2252(a)(2)&(b)(1)
	)	Receipt of Visual Depictions of Minors
	)	Engaging in Sexually Explicit Conduct
	)	
	)	Count 6: 18 U.S.C. §§ 2252A(a)(5)(B),
	)	2256(8)(C)&(9)(A)
	)	Possession of Child Pornography Modified
	)	to Appear that an Identifiable Minor is
	)	Engaging in Sexually Explicit Conduct
	)	
	)	Forfeiture Count 18 U.S.C. § 2253

INDICTMENT

June 2011 Term -- at Alexandria

Count 1

THE GRAND JURY CHARGES THAT:

Between in or around May 2004, and in or around April 2011, within the Eastern District of Virginia, the defendant, JUSTIN M. COLEMAN, did knowingly and intentionally employ, use, persuade, induce, entice, and coerce any minor, to wit: Jane Doe 1, an unaware, prepubescent female, to engage in any sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, to wit: video file titled "SANYO0003.MP4" with an MD5 hash value ending in "d44d51", using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer.

(In violation of Title 18, United States Code, Section 2251(a).)

Count 2

THE GRAND JURY FURTHER CHARGES THAT:

Between in or around May 2004, and in or around April 2011, within the Eastern District of Virginia, the defendant, JUSTIN M. COLEMAN, did knowingly and intentionally employ, use, persuade, induce, entice, and coerce any minor, to wit: Jane Doe 2, an unaware, prepubescent female, to engage in any sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, to wit: a video file with a title ending in the letters "JO" and an MD5 hash value ending in "5c55ae", using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer.

(In violation of Title 18, United States Code, Section 2251(a).)

Count 3

THE GRAND JURY FURTHER CHARGES THAT:

Between in or around May 2004, and in or around April 2011, within the Eastern District of Virginia, the defendant, JUSTIN M. COLEMAN, did knowingly and intentionally attempt to employ, use, persuade, induce, entice, and coerce any minor, to wit: Jane Doe 2, Jane Doe 3, Jane Doe 4, Jane Doe 5, Jane Doe 6, and Jane Doe 7, unaware, prepubescent females, to engage in any sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer.

(In violation of Title 18, United States Code, Sections 2251(a) & 2251(e).)

Count 4

THE GRAND JURY FURTHER CHARGES THAT:

Between in or around June 2010, and in or around August 2010, in Italy and elsewhere, the defendant, JUSTIN M. COLEMAN, did knowingly and intentionally attempt to employ, use, persuade, induce, entice, and coerce any minor, to wit: Jane Doe 8 and Jane Doe 9, unaware, minor female students at a Summer camp in Italy where JUSTIN M. COLEMAN was teaching, to engage in any sexually explicit conduct, for the purpose of producing any visual depiction of such conduct, using materials that were mailed, shipped and transported in and affecting interstate and foreign commerce by any means including by computer.

(In violation of Title 18, United States Code, Sections 2251(a)&(e) & 3238.)

Count 5

THE GRAND JURY FURTHER CHARGES THAT:

Between on or after November 1, 2008 and in or around April 2011 in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JUSTIN M. COLEMAN, did unlawfully and knowingly receive and attempt to receive, via the Internet, visual depictions of minors engaging in sexually explicit conduct, to wit: motion picture files and still image files depicting prepubescent children engaging in sexually explicit conduct including fellatio, actual and simulated vaginal and anal intercourse and the lascivious exhibition of the genitals and pubic area, using any means or facility of interstate or foreign commerce or that has been mailed and shipped and transported in or affecting interstate and foreign commerce and which contains materials which have been mailed and so shipped and transported, by any means including by computer, if (i) the producing of such visual depiction involves the use of a minor engaging in sexually explicit conduct and (ii) such visual depiction is of such conduct.

(In violation of Title 18, United States Code, Sections 2252(a)(2) & 2252(b)(1).)

Count 6

THE GRAND JURY FURTHER CHARGES:

On or about April 6, 2011, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, JUSTIN M. COLEMAN, did unlawfully and knowingly possess any computer disk, and any other material, that contained visual depictions that have been created, adapted, and modified to appear that an identifiable minor is engaging in sexually explicit conduct, to wit: digital images altered to depict former, minor female students of JUSTIN M. COLEMAN in Japan and Alexandria, Virginia engaging in sexually explicit conduct, that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce or in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

(In violation of Title 18, United States Code, Sections 2252A(a)(5)(B), 2256(8)(C) &(9)(A).)

Forfeiture Count

Upon conviction for violating 18 U.S.C. §§ 2251, 2252 and 2252A, defendant JUSTIN M. COLEMAN shall forfeit to the United States any and all matter which contains visual depictions produced, transported, shipped or received in violation thereof; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation; and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violation, including but not limited to the following:

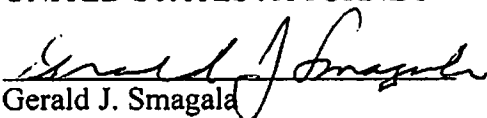
- (1) One HP Pavilion laptop computer, s/n CNF5120K2H;
- (2) One 60GB Hitachi hard disk drive, model no. IC25N060ATMR04-0, s/n KKGR8NVH;
- (3) One Acer Aspire laptop computer, s/n LUS050B111848410097B2535;
- (4) Two SanDisk 2GB SD cards;
- (5) One Panasonic 8MB SD card;
- (6) One Panasonic 128MB SD card;
- (7) Thirteen 3.5" floppy disks;
- (8) One SmartDisk Firelite USB external hard disk drive, model USBF2B60, with a Toshiba model MK6021GAS 60GB storage drive, s/n 93M80285T;
- (9) One Wolverine MVP9000 MP3 player w/60GB Toshiba hard disk drive, s/n 365C2706T;
- (10) One Panasonic 64MB SD card; and,
- (11) Seven pairs of girls panties.

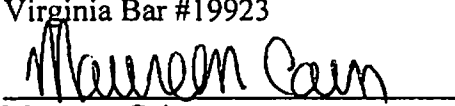
(Title 18, United States Code, Section 2253.)

A TRUE BILL pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office.

\_\_\_\_\_  
FOREPERSON

NEIL H. MACBRIDE  
UNITED STATES ATTORNEY

By:   
Gerald J. Smagala  
Assistant United States Attorney  
Virginia Bar #19923

  
By: Maureen Cain  
Special Assistant United States Attorney